

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2011-91-C**

In the Matter of the Application of)
Midwestern Telecommunications,)
Incorporated, d/b/a M.T.I. for Additional)
Designation as a Wireless Eligible)
Telecommunications Carrier Pursuant to)
47 U.S.C. § 214(e))

**DIRECT TESTIMONY OF IKECHUKU
CHINWAH**

Q. PLEASE STATE YOUR NAME, POSITION, AND BUSINESS ADDRESS.

A. My name is Ikechuku Chinwah. I am Co-CEO and President of Midwestern Telecommunications, Inc. (“The Company” or “M.T.I.”). My business address is 15426 S. 70th Ct., Orland Park, IL. 60462

Q. PLEASE BRIEFLY DESCRIBE YOUR BACKGROUND AND QUALIFICATIONS.

A. Prior to forming M.T.I. I worked as a consultant to Citgo’s Lemont Refinery, specializing in training on network computing systems and telecommunications systems. As Co-CEO of M.T.I., I have been involved in every facet of the Company’s growth from three (3) customers in September of 1997 to our current customer base of over 60,000.

Q. PLEASE DESCRIBE YOUR CURRENT POSITION AND ITS RESPONSIBILITIES.

A. I am Co-CEO and President of M.T.I. My responsibilities include managing the daily operations of M.T.I. I also oversee the Eligible Telecommunications Carrier (“ETC”) designation process in new states.

1 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

2 A. The purpose of my testimony is to discuss MTI's qualifications to receive additional
3 designation by this Commission as a wireless ETC for the purposes of receiving federal
4 universal service "Lifeline and Link-up" support, and why such designation will serve
5 consumers and the public interest generally. I would like to incorporate by reference into
6 this Testimony MTI's application filed in this Docket.

7
8 **Q. PLEASE DESCRIBE MTI.**

9 A. MTI is a competitive local exchange carrier ("CLEC") that started providing local phone
10 service to end users in 1997. MTI is currently certified to provide local phone service in
11 18 states, including the state of South Carolina. MTI was certified by the Commission on
12 March 12, 2003 via Order No. 2003-125 issued in Docket No. 2002-381-C. MTI was
13 approved as an ETC by the Commission on November 13, 2007 via Order No. 2007-763
14 issued in Docket No. 2007-32-C.

15
16 **Q. HAS MTI BEEN CERTIFIED AS AN ETC IN ANY OTHER STATE?**

17 A. Yes. MTI is currently designated as a wireline ETC in Alabama, Florida, Illinois,
18 Michigan, South Carolina and Wisconsin, and provides Lifeline/Link-Up service to over
19 3,000 customers in those states. MTI's ETC status is in good standing in all states where
20 granted. In addition, M.T.I. has been designated as a "wireless ETC" in the states of
21 Illinois, Wisconsin, and West Virginia

22
23 **Q. HAS MTI EVER HAD AN APPLICATION FOR ETC DESIGNATION DENIED?**

24 A. No.

1 **Q. WHAT IS THE AREA IN WHICH MTI SEEKS DESIGNATION AS A**
2 **WIRELESS ETC?**

3 A. MTI requests wireless ETC designation in all the non-rural wire centers of BellSouth
4 Telecommunications, Inc. d/b/a AT&T South Carolina. MTI does not request ETC
5 designation in any rural area at this time. Attached to the Application as **Exhibit One** is
6 a list of the AT&T wire centers for which MTI seeks ETC designation.

7
8 **Q. IS M.T.I. SEEKING DESIGNATION FOR PURPOSES OF RECEIVING HIGH-**
9 **COST SUPPORT FROM THE FEDERAL USF?**

10 A. No. MTI only seeks ETC designation in order to receive low-income support from the
11 federal USF.

12
13 **Q. DOES MTI SEEK REIMBURSEMENT FROM THE SOUTH CAROLINA**
14 **UNIVERSAL SERVICE FUND?**

15 A. No.

16
17 **Q. PLEASE DESCRIBE MTI'S WIRELESS LIFELINE OFFERING.**

18 A. MTI's plan offers eligible customers 68 prepaid minutes per month at no charge to the
19 customer, as well as access to the following features: Call Waiting, Caller ID, Voicemail,
20 3-Way Calling, and Text messages (charged at 1/3 minute per text [in or out]). Those
21 "free" minutes unused by a customer in a given month "roll over" until the account is
22 closed. After the first 68 minutes are consumed, eligible customers will have the option
23 to purchase minutes, for use in making standard cellular calls or texts, at the following
24 rates:

1 \$5.00 denomination - \$0.083 per minute of use;
2 \$10.00 denomination - \$0.055 per minute of use;
3 \$20.00 denomination - \$0.050 per minute of use;
4 \$50.00 denomination - \$0.050 per minute of use.

5
6 **Q. WILL LOW INCOME CUSTOMERS BE REQUIRED TO PAY FOR**
7 **HANDSETS?**

8 A. No. MTI will provide wireless handsets without charge to customers qualifying for Low
9 Income support.

10
11 **Q. HOW WILL CUSTOMERS SIGN UP FOR SERVICE?**

12 A. For wireline services, M.T.I. currently utilizes certification and verification safeguards to
13 ensure that ineligible subscribers are prevented from receiving multiple Link-Up and
14 Lifeline subsidies at the same address, in accordance with 47 C.F.R. § 54.411(c). Should
15 the Commission grant this Petition, M.T.I. will maintain those same safeguards with
16 respect to wireless services. MTI requires the customer to complete an application for
17 Lifeline and Link Up services. The application will require the customer to certify under
18 penalty of perjury by way of electronic signature that the customer receives benefits from
19 at least one of the qualifying programs and identifies the program or programs from
20 which that customer receives benefits.

21
22 **Q. PLEASE EXPLAIN HOW MTI MEETS THE REQUIREMENTS FOR ETC**
23 **DESIGNATION.**

24 A. MTI meets the requirements for designation as an ETC as established under federal
25 statutory law (47 U.S.C. § 214(e)), FCC regulation (47 C.F.R. § 54.201), and
26 Commission Rule 103-690.C. Specifically, MTI: (i) is a common carrier; (ii) will offer

1 the services supported by federal universal service support mechanisms as defined in 47
2 C.F.R. § 54.101(a); (iii) will use a combination of its own facilities and resold services to
3 provide the supported services; (iv) will provide the supported services throughout its
4 designated service area; (v) will advertise the availability of its universal service offerings
5 and charges for such offerings using media of general distribution; (vi) will make
6 available Low Income service to qualifying low income consumers; and (vii) will offer a
7 local usage plan comparable to the one offered by the incumbent LEC in its service area
8 in South Carolina.

9
10 **Q. IS MTI A COMMON CARRIER IN THE AREAS FOR WHICH IT SEEKS**
11 **DESIGNATION IN THIS PROCEEDING?**

12 A. Yes. MTI will provide wireless service throughout its requested Designated Service
13 Area. As a wireless provider currently providing service in Illinois and Wisconsin, MTI
14 is regulated as a common carrier, subject to all applicable regulations, and therefore
15 meets the ETC requirement of being a common carrier.

16
17 **Q. WHAT ARE THE SUPPORTED SERVICES THAT MTI IS REQUIRED TO**
18 **OFFER?**

19 A. Under Commission Rule 103-690.C, MTI is required to offer the nine services set forth in
20 FCC Rule 54.101(a). Specifically, these services are: (1) voice grade access to the public
21 switched telephone network; (2) local usage; (3) dual tone multi-frequency (“DTMF”) signaling or its functional equivalent; (4) single party service or its functional equivalent;
22 (5) access to emergency services; (6) access to operator services; (7) access to
23

1 interexchange service; (8) access to directory assistance; and (9) toll limitation for
2 qualifying low-income consumers.

3
4 **Q. HOW WILL MTI PROVIDE THESE SERVICES?**

5 A. These nine supported services will be provided in the following manner:

6 Voice Grade Access To The Public Switched Telephone Network

7 MTI will meet this requirement through its provision of wireless service and
8 interconnection to the public switched telephone network.

9 Local Usage

10 MTI will meet this requirement by providing the pricing plans described above. M.T.I.'s
11 Lifeline customers will receive specified amounts of wireless calling – local and long
12 distance – with no monthly recurring charge or other fees whatsoever. M.T.I.'s Lifeline
13 Wireless Plan includes sixty-eight (68) minutes of free local and long distance calls with
14 five features. Unused free minutes roll over, and additional minutes are available at the
15 competitive rates described above.

16 Dual Tone Multi-Frequency (“DTMF”) Signaling Or Its Functional Equivalent

17 MTI will meet this requirement by providing out-of-band digital signaling and in-band
18 multi-frequency signaling for call set-up and termination.

19 Single Party Service Or Its Functional Equivalent

20 MTI provides a dedicated message path for the length of a wireless user's particular
21 transmission.

22 Access To Emergency Services

MTI will meet this requirement by providing access to 911 service and meeting all requests for access to E911 service through local public service answering points (“PSAPs”).

Access To Operator Services

MTI will provide access to operator services.

Access To Interexchange Service

MTI provides its customers with the ability to make and receive calls over interexchange network facilities. Moreover, MTI provided an affidavit with its Application acknowledging that Federal Communications Commission may require it to provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access in the service area.

Access To Directory Assistance

MTI provides Directory Assistance service via its own facilities (a switch and call controller located in California).

Toll Limitation For Qualifying Low-Income Consumers

MTI will meet this requirement by offering service on a prepaid basis.

Q. HOW WILL MTI PROVISION ITS SERVICES?

A. MTI will offer the supported services using a combination of its own facilities and resale of another carrier’s services. MTI provides Directory Assistance service via its own facilities (a switch and call controller located in California), and provides the other services via resale of other carriers’ services.

1 **Q. WILL MTI PROVIDE THE SUPPORTED SERVICES TO CUSTOMERS**
2 **THROUGHOUT THE PROPOSED SERVICE AREA UPON REASONABLE**
3 **REQUEST?**

4 A. Yes. Pursuant to S.C. Code Ann. Regs. 103-690.C (a)(1)(A), M.T.I. will provide its
5 services throughout its service area to all customers making a reasonable request for
6 service.

7
8 **Q. WILL MTI ADVERTISE THE AVAILABILITY OF SUPPORTED SERVICES**
9 **AND THE CHARGES FOR SUCH SERVICES?**

10 A. Yes. M.T.I. commits to advertise the availability of, and charges for, the supported
11 services using media of general distribution, and provided an affidavit certifying same
12 along with the Application. As described in the two-year plan also submitted with the
13 Application, this advertising will occur through some combination of media channels,
14 such as television and radio, newspaper, magazine and other print advertisements,
15 outdoor advertising, direct marketing, and the Internet.

16
17 **Q. HOW WILL MTI REMAIN FUNCTIONAL IN EMERGENCY SITUATIONS?**

18 A. Yes. Because M.T.I. will lease facilities from a facilities-based wireless carrier (Sprint)
19 to serve its customers, MTI has the same ability to remain functional in emergency
20 situations as Sprint. Likewise, Sprint's network has reasonable amounts of back-up
21 power to ensure functionality without an external power source, and has implemented
22 reasonable practices to reroute traffic around damaged facilities and manage traffic spikes
23 resulting from emergency situations.

1 **Q. HOW WILL MTI COMPLY WITH APPLICABLE CONSUMER PROTECTION**
2 **AND SERVICE QUALITY STANDARDS?**

3 A. Pursuant to Commission Rule 103-690.C (a)(1)(C)(3), MTI will abide by the Cellular
4 Telecommunications and Internet Association's (CTIA's) Consumer Code for Wireless
5 Service ("CTIA Code").

6
7 **Q. HOW WOULD THE PUBLIC INTEREST BE SERVED BY A GRANT OF ETC**
8 **STATUS TO MTI?**

9 A. Granting M.T.I. additional ETC Designation for low income support related to its
10 wireless offerings will promote additional deployment of M.T.I.'s offerings in the areas
11 served by AT&T South Carolina. M.T.I. offers quality services at affordable prices, and
12 adds another choice of wireless provider in the AT&T service areas of South Carolina.
13 Additionally, ETC status will allow M.T.I. to offer wireless service to many low income
14 customers who may not have been able to have service but for the Company.

15
16 **Q DOES THIS CONCLUDE YOUR TESTIMONY?**

17 A. Yes.

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CERTIFICATE OF SERVICE

This is to certify that I have caused to be served this day, one (1) copy of the Direct Testimony of Ikechuku Chinwah by placing a copy of same in the care and custody of the United States Postal Service (unless otherwise specified), with proper first-class postage affixed hereto and addressed as follows:

VIA ELECTRONIC MAIL SERVICE

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s/ Carol Roof
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May 19, 2011
Columbia, South Carolina